



Connecticut Parks Association, Inc.

www.ctparks.org

March 13, 2014

To the Members of The Public Health Committee:

The Connecticut Parks Association appreciates this opportunity to offer my comments in opposition to Raised Bill HP 5330, An Act concerning, The Application of Pesticides at Parks, Playgrounds, Athletic Fields and Municipal Greens.

As the President of the CT Park Association, I would like to tell you that the Association has been active since 1958. Our purpose is to promote accession, development, maintenance and preservation of our parks and natural resources throughout the state.

Our organization is made up of over 160 park professionals throughout the state. As the demands of the community to have the best and safest fields has risen over the years, many towns have assigned their park departments to the maintenance of school grounds, Towns have turned to their park departments because they have the highest caliber of staff training for proper turf management.

Turf athletic fields, when properly maintained, are more forgiving to athletes when playing. Environmentally, they contribute to the oxygen and gas cycles. Improperly maintained fields can be a contributing factor to pulled muscles, broken bones and even career ending injuries and concessions.. (While pesticides are not frequently used on these fields, there are key periods when they are needed. They are used to combat infestation of crabgrass or reduce grub infestation to keep a strong root system.

Our organizations supports Best Management Practices Utilizing Integrated Pest Management (IPM) which is the integration of knowledge and cultural-management systems designed to improve the long-term health of turf-grass (and other crops) through the suppression of problem pests. The overriding goal of IPM is to minimize the impact on humans, the environment and non-target organisms.

Common IPM techniques include the following:

1. Use of unbiased information
2. Quality monitoring
3. Anticipation of pest-population increases
4. Use of naturally occurring biological controls (I.E., use of pest-resistant plant species)
5. Adoption of cultural-management practices
6. Carefully selected applications of products after monitoring and establishing thresholds have been met.

An IPM program protects the financial investment Towns have made in school grounds and athletic fields. IPM utilities trained, regulated and licensed professionals

The Connecticut Park Association supports The Municipal Opportunities for Regional Efficiencies (MORE) Mandates working group, recently adopted recommendations to:

1. Utilize the Pesticide Advisory Council, as constituted in CGS Section 22a-65(d) to (a) review all new pesticide on a continuing basis for safety and effectiveness and (b) report their findings to the Commissioner of DEEP for consideration in adopting regulations.
2. Require DEEP, in consultation with the Pesticide Advisory Council, create, publish, and regularly update a set of best practices, including a review of the Massachusetts IPM monitoring websites (www.massnrc.org), for use by municipalities regarding the safe and effective use of both synthetic and organic pesticides.

Also consider the long term environmental damage that will be caused by Emerald Ash Borer to ash trees, because we cannot use low toxicity products to control them should the ban on IPM be expanded. IPM is necessary to treat.

We, as a professional organization, rely on science and the research plan at universities throughout the country and our state to provide us with the scientific facts, as well as the DEEP. Our organization works with UConn, experimental center and the extension centers to provide us with the most updated research and techniques to be used in our profession.

Sincerely,

Richard J. Calarco CSFM, CPRA, AOLCP
President Ct Park Association
860-530-1281